

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

THE McPHERSON BUILDING  
901 FIFTEENTH STREET, N.W., SUITE 1100  
WASHINGTON, D.C. 20005-2327

425 PARK AVENUE  
NEW YORK, NY 10022-3598  
(212) 836-8000

1999 AVENUE OF THE STARS  
SUITE 1600  
LOS ANGELES, CA 90067-6048  
(310) 788-1000

SQUARE DE MEEÛS 30  
1040 BRUSSELS, BELGIUM  
(322) 514-4300

(202) 682-3500

FACSIMILE  
(202) 682-3580

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HONG KONG  
(852) 845-8989

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22 JIANGUOMENWAI DAJIE  
BEIJING  
PEOPLE'S REPUBLIC OF CHINA  
(861) 512-4755

FACSIMILE  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WRITER'S DIRECT DIAL NUMBER

(202) 682-3501

December 21, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: MM Docket No. 93-250  
RM-8331  
RM-8397  
RM-8398  
Fairview, Pennsylvania  
KDC, Inc.

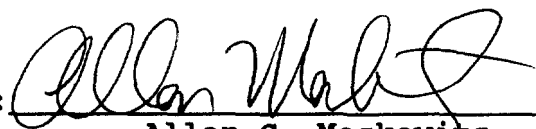
Dear Mr. Caton:

On behalf of KDC, Inc., we are filing herewith an original and four copies of its "Further Reply Comments" to the Notice of Proposed Rule Making to assign Channel 298A to Fairview, Pennsylvania.

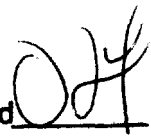
Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

By:   
Allan G. Moskowitz

No. of Copies rec'd  
List ABCDE



**Federal Communications Commission**

WASHINGTON, D.C. 20554

In the Matter of )

Amendment of Section 73.202(b) )

Table of Allotments )

FM Broadcast Stations )

(Fairview, Pennsylvania) )

MM Docket No. 93-250

RM-8331

RM-8397

RM-8398

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DEC 21 1993

TO: Chief, Policy and Rules Division

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**FURTHER REPLY COMMENTS**

KDC, Inc. ("KDC"), by its attorney, pursuant to Section 1.420 of the Commission's Rules and in response to the FCC's Public Notice, Report No. 1989, released December 6, 1993, hereby submits its "Further Reply Comments" in response to the counterproposals filed to the proposed allotment of Channel 298A to Fairview, Pennsylvania, as that community's first local aural transmission service.

In support thereof, the following is respectfully shown:

1. KDC respectfully requests that its "Reply Comments" filed on December 3, 1993, in response to the Notice of Proposed Rule Making ("NPRM"), DA 93-1145, released September 30, 1993, be incorporated by reference, in its entirety, in the instant "Further Reply Comments". In its December 3, 1993, "Reply Comments", KDC recognized that counterproposals to the NPRM were filed by Thomas J. Sauber ("Sauber"), proposing Channel 298A to Cambridge Springs, Pennsylvania, as its first local transmission service, and North Kingsville Broadcasting ("NKB"), proposing

Channel 298A to North Kingsville, Ohio, as that community's first local service. Further, as indicated therein, KDC proposed equivalent channels for each counterproposed community. Specifically, KDC noted that Channel 241A may be allotted to North Kingsville, Ohio, in compliance with the Commission's Rules, and at the same reference coordinates proposed by NKB.<sup>1</sup> Similarly, Channel 283A can be allotted to Cambridge Springs, Pennsylvania, in compliance with the Commission's Rules, and at the same reference coordinates proposed by Sauber.

**Channel 298A Should be Allotted to Fairview**

2. KDC submits that the best and most technically feasible arrangement of allotments among the three communities are those proposed in its December 3, 1993 "Reply Comments" which are enumerated above. Attached hereto as Exhibit 1 is the Engineering Report of Glen Clark & Associates, engineering consultants to KDC, which discusses the possibility that Channel 230A could be allotted to Fairview, Pennsylvania in lieu of Channel 298A. However, as Mr. Clark shows, while Channel 298A at Fairview would have a minor shortspacing to a vacant Class A allotment at Welland, Ontario, and ~~that~~ the majority of the implied overlap would incur over water, the allotment of Channel 230A at Fairview is unworkable in that the allotment would be shortspaced to CKLW-FM at Windsor, Ontario, a Class C1 station

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<sup>1</sup> On December 3, 1993, Sauber also filed Reply Comments which also proposed that Channel 241A can be allotted to North Kingsville, Ohio.

operating with 100 kW with a long over-water propagation path existing between the two allotments. In other words, while Channel 230A can theoretically be allotted to Fairview in compliance with the Commission's Rules, as a practical matter, operation of a station at Fairview on Channel 230A would be technically inferior.

3. Consequently, KDC still believes that the most suitable arrangement of allotments for the three communities are that Channel 241A be allotted to North Kingsville, Ohio; that Channel 283A be allotted to Cambridge Springs, Pennsylvania; and that Channel 298A be allotted to Fairview, Pennsylvania. Further, KDC respectfully requests that the Commission consider specially-negotiated allotments with the Canadian government for these three channels.

**Fairview Should be Preferred Over  
Cambridge Springs for Channel 298A**

4. As KDC has previously shown, the appropriate analysis to consider the instant mutually-exclusive proposals must be based on In Revision of FM Assignment Policies and Procedures, 90 FCC 2d. 88 (1982); specifically, the Fourth allotment priority "Other Public Interest Matters". Within that category, the most important factor is population. Not only does Fairview have a 1990 population of 1,988, while Cambridge Springs has a 1990 population of 1,837, Fairview is growing, whereas Cambridge Springs is declining. Fairview's U.S. Census population in 1970 was 1,707, in 1980 it was 1,855, and in 1990 it was 1,988; a

growth of 16.5% between 1970 and 1990. Similarly, Fairview Township, of which Fairview Borough is the center, has grown from 6,256 in 1970 to 7,839 in 1990. In comparison, Cambridge Springs had a 1980 population of 2,102 and a 1990 population of 1,837; a decline of 12.6%. The trends in the two communities will only widen the population gap between Fairview and Cambridge Springs in the future.

5. While Sauber attempts to paint Fairview as a contiguous suburb of Erie and Cambridge Springs as an isolated village, a good map will reflect reality. First of all, as indicated by Exhibit 2, a map from the 1990 U.S. Census, Fairview is not even contiguous with Erie. The Township of Millcreek (1990 population of 46,820!) separates the Township of Fairview from Erie. Furthermore, the Borough of Fairview is located on the west side of the Township and is actually closer to the community of Girard, Pennsylvania than to Erie. Fairview is approximately eight miles from Erie. In contrast, Cambridge Springs is less than 20 miles from Erie and is as much a part of the Erie ADI as Fairview. For example, attached hereto as Exhibit 3 is the first page of an Erie telephone book for 1993-94 which lists the various communities included in the telephone book. The first community listed is Cambridge Springs.

6. With respect to reception services, Cambridge Springs actually receives more FM services than does Fairview. As indicated in Exhibit 1, eight FM services serve Fairview with

1 mV/m contour or greater, while only seven FM stations serve Fairview with that degree of service.

7. Consequently, because both communities are proximate to Erie and Cambridge Springs actually receives more reception services than Fairview, and because Fairview is larger and growing, while Cambridge Springs is smaller and declining, the allotment of Channel 298A to Cambridge Springs is preferable under the applicable allotment priorities.

8. Sauber, in both his Counterproposal and his December 3, 1993 Reply Comments, incorrectly argues that the Commission should apply the "Huntington Doctrine" as elucidated in FM Channel Assignments (Eatonton, Sandy Springs, Georgia; Anniston, Lineville, Alabama), 6 FCC Rcd 6580 (Chief, Mass Media Bureau, 1991) to support its allegation that Channel 298A should not be allotted to Fairview as a first local service because Fairview is merely a suburb of Erie. As KDC has previously shown, the Commission has already rejected the application of the "Huntington Doctrine" in a rulemaking wherein a community is proposed as a new local service rather than a change of community of license. See, Remington and Falmouth, Virginia, DA 93-1045, released September 7, 1993, at Footnote 5.

9. However, even if, arguendo, the "Huntington Doctrine" analysis is applied, the facts do not support a conclusion that the allocation for Fairview is really for Erie any more (or any less) than the relevant facts would support a conclusion that the

proposed Cambridge Springs station is really an Erie service.<sup>2</sup> In Faye and Richard Tuck, Inc., 3 FCC Rcd 5374 (1988), the Commission concluded that the interdependence (or independence) of the specified "community" to the central city would be the most important consideration under the "Huntington Doctrine" to determine whether the proposed allotment should be treated as the additional service of the larger metropolitan area. The Commission set forth eight specific characteristics in assessing the interdependence of the specified community with the central city which it stated it would consider. Of those, the majority show that Fairview is absolutely independent of Erie. First, as indicated, Fairview is geographically separated from Erie; in fact, another populous political subdivision is between them. Second, while Fairview may not have its own newspaper or telephone company, it certainly has its own separate local government, elected local officials, school system, police and fire departments, post office, zip code and tax collector, numerous commercial establishments and health facilities (see Exhibit 4 for a complete listing), a Senior Center, American Legion, Lions, Rotary and Garden clubs, its own Business Association and an historical society. While there has been no showing by Sauber as to the extent that Fairview residents work

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<sup>2</sup> Sauber's contention at Footnote 1 to his Reply that KDC should be precluded from submitting demographic information in response to Sauber's Counterproposal is inane as that is the main purpose of "Reply" pleadings; to reply to arguments raised in the counterproposals.

in Erie, in light of the existence of manufacturing companies like Titan Tool Company and Darr Industries, Inc., a plastic molding company, and various other service industries within Fairview Township, it is likely that many Fairview residents do not work in Erie but rather work in either the Borough or the Township.

10. Finally, and most significantly, it is clear that both community leaders and residents perceive Fairview as being separate from Erie. Attached hereto as Exhibit 5 is the Friday, December 17, 1993 article from the Erie Daily Times which reports that a Task Force is studying whether Fairview Borough and Fairview Township should be merged or consolidated. Please note that the Task Force is not studying annexation of Fairview by the City of Erie. Consequently, it is clear that Fairview considers itself a separate and distinct community and governmental unit from Erie which is nearly 10 miles away.

11. Therefore, even if the "Huntington Doctrine" was applicable to the instant situation, the relevant facts do not support the conclusion that Fairview is a mere "appendage" of Erie nor that the community is interdependent on Erie. Instead, Fairview is a totally separate and distinct community, vibrant, growing and worthy of its own allocation.

12. KDC reiterates its intention of submitting an application for a new FM radio station construction permit for Channel 298A at Fairview, Pennsylvania if the Commission assigns that channel to Fairview. Further, KDC presently commits itself



to construct the station as expeditiously as possible if its application is granted.

### Conclusion


13. KDC submits that, pursuant to the Commission's allotment priorities, should the Commission conclude that it is feasible for only one channel to be allotted in this proceeding, the public interest mandates that Channel 298A be allotted to Fairview, Pennsylvania as that community's first local service. Should the Commission find that two channels are feasible for allotment, then the channels should be allotted to Fairview and North Kingsville, Ohio. However, as reflected in the attached engineering statement, KDC believes that it is feasible, and strongly supports its proposal, to allot equivalent Class A channels to each of the three communities.

14. Therefore, KDC respectfully requests that the Commission amend the FM Table of Allotments, Section 73.202(b), as follows:

	<u>PRESENT</u>	<u>PROPOSED</u>
North Kingsville, OH	---	241A
Fairview, PA	---	298A
Cambridge Springs, PA	---	283A

Respectfully submitted,

KDC, INC.

By:   
Allan G. Moskowitz  
Its Attorney

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER  
901 Fifteenth Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
(202) 682-3501

December 21, 1993

**EXHIBIT 1**

**ENGINEERING REPORT**

**IN SUPPORT OF  
FURTHER REPLY COMMENTS  
IN RM-8331, MM DOCKET 93-250  
PROPOSING TO ADD CHANNEL 298A AT  
FAIRVIEW, PENNSYLVANIA**

**KDC, Inc.**

**December 20, 1993**

**Glen Clark & Associates  
Broadcast Consultants**

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**Greenville, PA**

## ENGINEERING STATEMENT

The following analysis and materials have been prepared on behalf of KDC, Inc. ("KDC"), Petitioner in RM-8331, MM DOCKET 93-250.

### INTRODUCTION

In September of 1993, KDC, Inc. filed a Petition to modify the FM Table of Allotments by adding Channel 298A at Fairview, Pennsylvania.

On September 30th of this year, the Commission Released a Notice of Proposed Rulemaking, stating intention to modify the FM Table of Allotments by adding Channel 298A at Fairview, Pennsylvania. Reference numbers RM-8331 and MM DOCKET 93-250 were assigned to this proceeding.

Two parties responded on the Comment date with counterproposals: North Kingsville Broadcasters ("NKB") proposed to allot Channel 298A to North Kingsville, Ohio. Thomas J. Sauber ("Sauber") proposed to allot Channel 298A to Cambridge Springs, Pennsylvania. Both counterproposals are mutually-exclusive with the original proposal at Fairview.

### ALTERNATIVE CHANNELS EXIST FOR ALL PARTIES

KDC showed, during reply comments, that alternate channels exist for all parties. The following alternatives were proposed therein:

	<u>PRESENT</u>	<u>PROPOSED</u>
NORTH KINGSVILLE, OH	- -	241A
CAMBRIDGE SPRINGS, PA	- -	283A
FAIRVIEW, PA	- -	298A

Coincidentally, Sauber also proposed Channel 241A as an alternative channel at North Kingsville.

### DISCUSSION AMONG THE PROPONENTS

KDC's engineering and legal representatives contacted the representatives of the other parties in an effort to reach a negotiated settlement. That is, to determine if the proposed substitutions at Cambridge Springs and North Kingsville were acceptable in place of Channel 298.

NKB was noncommittal. Sauber's representatives stated firmly that they would not accept Channel 283A and that they would insist upon Channel 298A at Cambridge Springs.

Sauber's representatives offered not explanation of why they would insist on Channel 298A. Commission policy is clear that all FM channels of the same class are considered to be equivalent.

Sauber counterproposed that KDC accept Channel 230A at Fairview, allowing Sauber to have Channel 298.

#### UNACCEPTABILITY OF CHANNEL 230A AT FAIRVIEW, PA

While no formal proposal suggesting the use of Channel 230A at Fairview has been filed in this proceeding, it is our understanding that such a proposal will be made by Sauber. For reasons described below, Channel 230A is unworkable at Fairview. It is our intention to address these technical problems with Channel 230A at this time, even though this response will be contemporaneous with the anticipated proposal.

As was described in great detail in both earlier comment periods, Channel 298A has a minor shortspacing to Canada, requiring a directional antenna with a northward-facing null and a specially-negotiated agreement with Canada. The directional antenna is no hindrance whatever, as Fairview is on the southern shore of Lake Erie and the null toward Canada falls harmlessly across the unpopulated lake.

Channel 230A also has a shortspacing with Canada. However, this shortspacing is far more severe. Channel 230A at Fairview would be shortspaced to CKLW-FM at Windsor, Ontario, Canada. Further, CKLW is a Class C1 station operating with 100 kilowatts. Whereas the shortspacing on Channel 298 is to a Class A Canadian facility. Moreover, a long over-water propagation path exists from CKLW to Fairview. Qualitative listening tests performed near Fairview on the evening of November 13th showed a full-quieting signal being delivered to the Fairview area by CKLW.

Superior propagation over long over-water paths is common. Clearly, if an existing station delivers a full-quieting signal to a desired service area, a new station proposing to serve that community with a local service on the same channel will receive gross interference.

#### PRESENT SERVICE RECEIVED BY COMMUNITIES INVOLVED IN THIS PROCEEDING

Three computer printouts are attached which list all stations in the FCC database within 60 kilometers of the reference coordinates for each of the three communities. Using the "reference distance"s from Part 73.211 of 28 kilometers for Class A, 39 kilometers for Class B1 and 52 kilometers for Class B, these studies show that all four communities presently receive four or more FM services of 1 mV/m or greater. Cambridge Springs receives the most with 8 FM services. Fairview has 7 and North Kingsville has 4.

Those services are:

FM STATIONS SERVING NORTH KINGSVILLE WITH 1 mV/m OR MORE

WREO-FM	Ashtabula, Ohio	Channel 246B
WPHR(FM)	Ashtabula, Ohio	Channel 252A
WZOO(FM)	Edgewood, Ohio	Channel 273A
WGOJ(FM)	Conneaut, Ohio	Channel 288A

FM STATIONS SERVING CAMBRIDGE SPRINGS WITH 1 mV/m OR MORE

WEOZ(FM)	Saegertown, PA	Channel 232A
WFGO(FM)	Erie, PA	Channel 234A
WXTA(FM)	Edinboro, PA	Channel 250B1
WXKC(FM)	Erie, PA	Channel 260B
WZPR(FM)	Meadville, PA	Channel 262B
WJET(FM)	Erie, PA	Channel 272A
WMXE(FM)	Erie, PA	Channel 279B
WCTL(FM)	Union City, PA	Channel 292A

FM STATIONS SERVING FAIRVIEW WITH 1 mV/m OR MORE

WFGO(FM)	Erie, PA	Channel 234A
WREO-FM	Ashtabula, Ohio	Channel 246B
WXTA(FM)	Edinboro, PA	Channel 250B1
WXKC(FM)	Erie, PA	Channel 260B
WZPR(FM)	Meadville, PA	Channel 262B
WJET(FM)	Erie, PA	Channel 272A
WMXE(FM)	Erie, PA	Channel 279B

While Roanoke Rapids and/or Anamosa studies are no longer required by the Commission for comparing the merits of competing communities, the methodology established in those two cases shows that none of the communities involved herein is absent a plurality or services.

CAMBRIDGE SPRINGS IS NOT A FRONTIER OUTPOST

Sauber has argued at great length that Fairview is a bedroom community to Erie, Pennsylvania, a larger city. At the same time, Sauber has attempted to show that Cambridge Springs is, by comparison, an isolated community. Perhaps Sauber would wish us to believe it is a frontier outpost, miles from any other civilization. Such characterization is simply not supportable by the facts.

Six of the seven FM services received at Fairview are also received at Cambridge Springs. Distant Class B station WREO-FM is the only facility which places a 1 mV/m signal over Fairview but which does not reach Cambridge Springs. If WREO's 54 dBu signal would be considered (the protected contour for a Class B station), WREO would also serve Cambridge Springs.

All four FM stations licensed to Erie, which Sauber claims not to be proximal to, WMXE, WJET, WFGO and WXKC, are received at Cambridge Springs.

In addition, Cambridge Springs receives service from two facilities which Fairview does not: WEOZ and WCTL. This causes Cambridge Springs to have a GREATER number of available FM services than does Fairview (eight versus seven).

Sauber's carefully-worded innuendos, designed to give the impression that Cambridge Springs is an isolated frontier outpost, desperately short of aural services, have no basis in reality.

ENGINEER'S ATTEST

The preceding materials were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge and belief.



December 20, 1993

Glen T. Clark, P.E.  
Georgia Registration #18713

\* \* \* \* \*



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 \* PROGRAM FMWITHIN \*  
 \* COPYRIGHT 1986 AND 1989 BY GLEN CLARK \*  
 \* VERSION 1.8 - 15 DEC 89 \*  
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STUDY NAME - FAIRVIEW PA

SEARCHED FROM CHANNEL 221 TO CHANNEL 300.  
 THE MAXIMUM DISTANCE OF INTEREST IS - 60.00 KM.  
 CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 42 1 46 North Latitude  
 80 15 21 West Longitude

CITY/STATE/COUNTRY	CALL	CHANNEL	STATUS	POWER	TD	HEIGHT	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #	RECORD #
Saegertown	PA US	WEOZ	232A FM LIC	3.00	NN	91	36.59	168.7	41 42 23	80 10 9	BLH790109AD	2965
Saegertown	PA US	232A	FA USED	0.00	NN	0	36.59	168.7	41 42 23	80 10 9		2813
Erie	PA US	WFGO	234A FM CP MOD	1.10	NN	164	15.52	85.6	42 2 25	80 4 8	BMPH9205291B	3261
Erie	PA US	234A	FA USED	0.00	NN	0	17.79	51.9	42 7 42	80 5 12		3359
Ashtabula	OH US		246B FA USED	0.00	NN	0	49.59	241.5	41 48 58	80 46 52		6126
Ashtabula	OH US	WREOFM	246B FM LIC	50.00	NN	152	49.59	241.5	41 48 58	80 46 52	BLH6047	6042
Edinboro	PA US	WXTA	250B1 FM LIC	10.00	NN	154	13.88	120.3	41 57 59	80 6 40	BLH920326KA	7108
Edinboro	PA US		250B1 FA USED	0.00	NN	0	13.88	120.3	41 57 59	80 6 40		6914
Ashtabula	OH US	WPHR	252A FM CP	2.00	NN	123	39.80	241.9	41 51 39	80 40 46	BPH891207MF	7396
Ashtabula	OH US		252A FA USED	0.00	NN	0	41.65	251.0	41 54 27	80 43 52		7575
Ashtabula	OH US	WPHR	252A FM APP	4.10	NY	121	49.59	241.5	41 48 58	80 46 52	BMPH9303181F	7619
Erie	PA US	WXKC	260B FM LIC	50.00	NY	150	25.92	75.0	42 5 24	79 57 12	BLH880322KB	9256
Erie	PA US		260B FA USED	0.00	NN	0	25.92	75.0	42 5 24	79 57 12		9161
Meadville	PA US	WZPR	262B FM LIC	20.00	NN	179	44.69	171.6	41 37 53	80 10 37	BLH851119KD	9706
Meadville	PA US		262B FA USED	0.00	NN	0	44.69	171.6	41 37 53	80 10 37		9663
North East	PA US	WRKT	265A FM LIC	6.00	NN	80	37.78	59.5	42 12 7	79 51 43	BLH910107KB	10458
North East	PA US		265B1 FA USED	0.00	NN	0	42.60	62.2	42 12 30	79 48 0		10356
North East	PA US	WRKT	265B1 FM CP	4.20	NY	243	45.59	65.8	42 11 51	79 45 10	BPH9202041C	10265
Linesville	PA US	WVCC	269A FM LIC	3.00	NN	67	42.13	202.9	41 40 48	80 27 12	BLH4755	11383
Linesville	PA US		269A FA USED	0.00	NN	0	42.13	202.9	41 40 48	80 27 12		11367
Erie	PA US		272A FA USED	0.00	NN	0	15.52	85.6	42 2 25	80 4 8		12006
Erie	PA US	WJET	272A FM LIC	1.70	NY	187	15.52	85.6	42 2 25	80 4 8	BLH920602KB	11817
Edgewood	OH US		273A FA USED	0.00	NN	0	49.01	250.2	41 52 47	80 48 43		12261
Edgewood	OH US	WZOOFM	273A FM LIC	5.80	NN	100	52.15	244.7	41 49 44	80 49 28	BLH911104KD	12307
Erie	PA US		279B FA USED	0.00	NN	0	26.71	75.3	42 5 25	79 56 37		13651
Erie	PA US	WMXE	279B FM LIC	50.00	NN	152	26.71	75.3	42 5 25	79 56 37	BMLH871209KC	13562
Conneaut	OH US	WGOJ	288A FM CP	6.00	NY	90	28.56	229.3	41 51 42	80 31 1	BPH9003121A	16110
Conneaut	OH US		288A FA USED	0.00	NN	0	28.56	229.3	41 51 42	80 31 1		16017
Conneaut	OH US	WGOJ	288A FM LIC	3.00	NN	90	28.56	229.3	41 51 42	80 31 1	BLH801023AB	15806
Union City	PA US	WCTL	292A FM LIC	3.40	NN	131	31.63	95.7	42 0 4	79 52 33	BLH920323KD	17118
Union City	PA US		292A FA USED	0.00	NN	0	38.80	119.2	41 51 33	79 50 50		16955

STUDY COMPLETE.  
 31 RECORDS PRINTED.

\*\*\*\*\*  
 \* PROGRAM FMWITHIN \*  
 \* COPYRIGHT 1986 AND 1989 BY GLEN CLARK \*  
 \* VERSION 1.8 - 15 DEC 89 \*  
 \*\*\*\*\*

STUDY NAME - NORTH KINGS

SEARCHED FROM CHANNEL 221 TO CHANNEL 300.  
 THE MAXIMUM DISTANCE OF INTEREST IS - 60.00 KM.  
 CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 41 54 18 North Latitude  
 80 41 36 West Longitude

CITY/STATE/COUNTRY	CALL	CHANNEL	STATUS	POWER	TD	HEIGHT	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #	RECORD #
North Madison	OH US	NEW	229A FM APP	3.50	NN	132	34.22	244.9	41 46 27	81 3 59	BPH930119MB	2166
North Madison	OH US	NEW	229A FM APP	6.00	NN	100	36.60	253.4	41 48 39	81 6 57	BPH930121MF	2324
North Madison	OH US	NEW	229A FM APP	6.00	NN	100	39.67	250.5	41 47 8	81 8 37	BPH930121MB	2229
North Madison	OH US	NEW	229A FM APP	6.00	NN	100	39.67	250.5	41 47 8	81 8 37	BPH930121MG	2176
North Madison	OH US		229A FA VACANT	0.00	NN	0	40.84	252.1	41 47 31	81 9 41		2321
North Madison	OH US	NEW	229A FM APP	6.00	NN	100	40.84	252.1	41 47 31	81 9 41	BPED930121MD	2281
Saegertown	PA US	WEOZ	232A FM LIC	3.00	NN	91	48.82	116.9	41 42 23	80 10 9	BLH790109AD	2965
Saegertown	PA US		232A FA USED	0.00	NN	0	48.82	116.9	41 42 23	80 10 9		2813
Erie	PA US	WFGO	234A FM CP MOD	1.10	NN	164	53.89	73.8	42 2 25	80 4 8	BMPH9205291B	3261
Erie	PA US		234A FA USED	0.00	NN	0	56.03	63.7	42 7 42	80 5 12		3359
Ashtabula	OH US		246B FA USED	0.00	NN	0	12.27	216.4	41 48 58	80 46 52		6126
Ashtabula	OH US	WREOFM	246B FM LIC	50.00	NN	152	12.27	216.4	41 48 58	80 46 52	BLH6047	6042
Edinboro	PA US	WXTA	250B1 FM LIC	10.00	NN	154	48.76	82.0	41 57 59	80 6 40	BLH920326KA	7108
Edinboro	PA US		250B1 FA USED	0.00	NN	0	48.76	82.0	41 57 59	80 6 40		6914
Ashtabula	OH US		252A FA USED	0.00	NN	0	3.15	275.1	41 54 27	80 43 52		7575
Ashtabula	OH US	WPHR	252A FM CP	2.00	NN	123	5.04	166.8	41 51 39	80 40 46	BPH891207MF	7396
Ashtabula	OH US	WPHR	252A FM APP	4.10	NY	121	12.27	216.4	41 48 58	80 46 52	BMPH9303181F	7619
Meadville	PA US	WZPR	262B FM LIC	20.00	NN	179	52.59	125.3	41 37 53	80 10 37	BLH851119KD	9706
Meadville	PA US		262B FA USED	0.00	NN	0	52.59	125.3	41 37 53	80 10 37		9663
Linesville	PA US	WVCC	269A FM LIC	3.00	NN	67	31.97	141.4	41 40 48	80 27 12	BLH4755	11383
Linesville	PA US		269A FA USED	0.00	NN	0	31.97	141.4	41 40 48	80 27 12		11367
Erie	PA US		272A FA USED	0.00	NN	0	53.89	73.8	42 2 25	80 4 8		12006
Erie	PA US	WJET	272A FM LIC	1.70	NY	187	53.89	73.8	42 2 25	80 4 8	BLH920602KB	11817
Edgewood	OH US		273A FA USED	0.00	NN	0	10.23	254.1	41 52 47	80 48 43		12261
Edgewood	OH US	WZOOFM	273A FM LIC	5.80	NN	100	13.78	232.2	41 49 44	80 49 28	BLH911104KD	12307
Geneva	OH US		284A FA VACANT	0.00	NN	0	37.40	253.8	41 48 39	81 7 33		14654
Geneva	OH US	WKKY	285A FM LIC	3.00	NN	91	26.72	249.6	41 49 16	80 59 42	BLH871204KB	14870
Conneaut	OH US	WGOJ	288A FM CP	6.00	NY	90	15.41	108.2	41 51 42	80 31 1	BPH9003121A	16110
Conneaut	OH US		288A FA USED	0.00	NN	0	15.41	108.2	41 51 42	80 31 1		16017
Conneaut	OH US	WGOJ	288A FM LIC	3.00	NN	90	15.41	108.2	41 51 42	80 31 1	BLH801023AB	15806

STUDY COMPLETE.  
 30 RECORDS PRINTED.

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 \* PROGRAM FMWITHIN \*  
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STUDY NAME - CAMBRIDGE S

SEARCHED FROM CHANNEL 221 TO CHANNEL 300.  
 THE MAXIMUM DISTANCE OF INTEREST IS - 60.00 KM.  
 CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 41 48 13 North Latitude  
 80 3 24 West Longitude

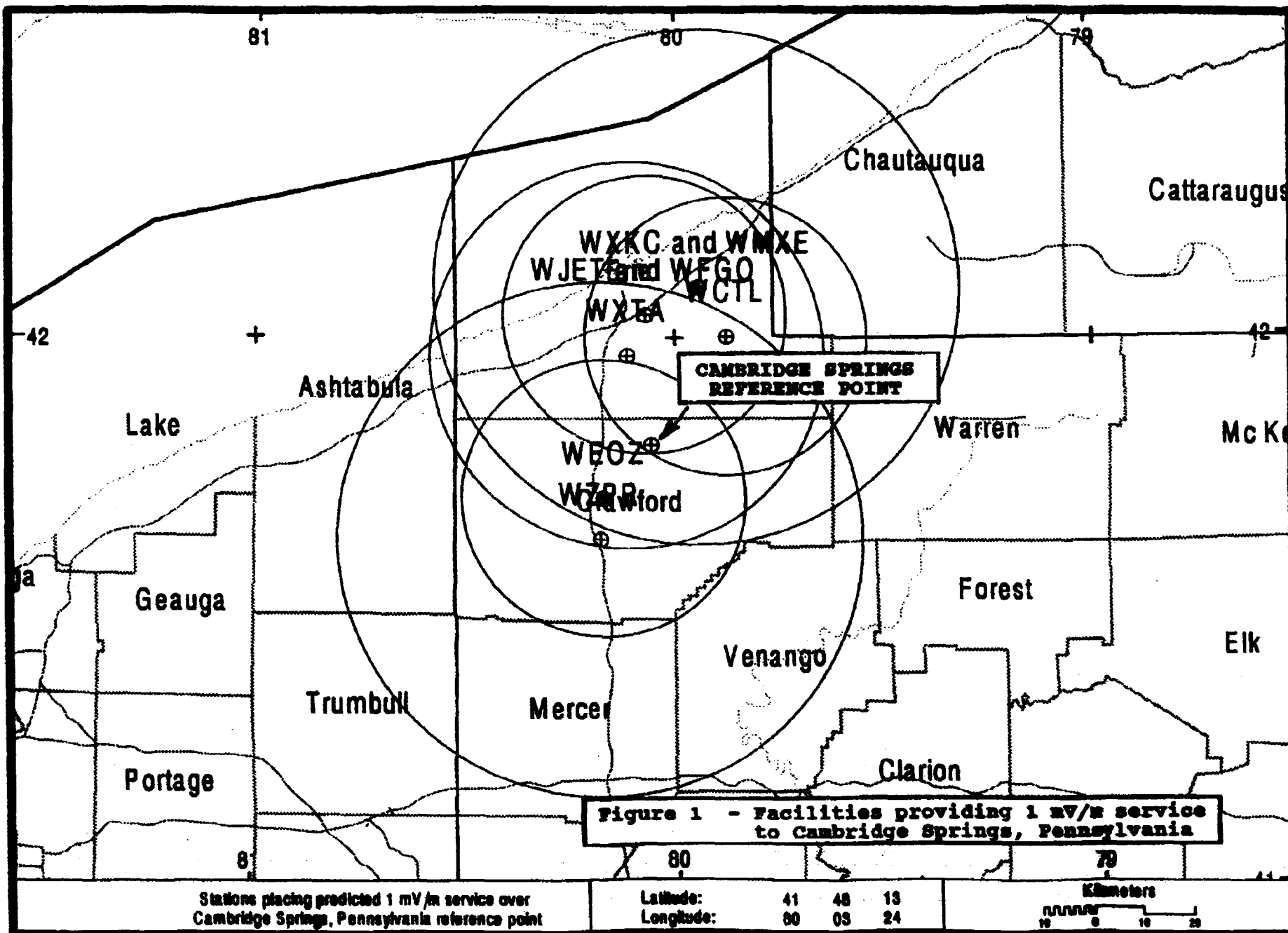
CITY/STATE/COUNTRY	CALL	CHANNEL	STATUS	POWER	TD	HEIGHT	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #	RECORD #
Saegertown	PA US	WEOZ	232A FM LIC	3.00	NN	91	14.28	220.9	41 42 23	80 10 9	BLH790109AD	2965
Saegertown	PA US	232A	FA USED	0.00	NN	0	14.28	220.9	41 42 23	80 10 9		2813
Erie	PA US	WFGO	234A FM CP MOD	1.10	NN	164	26.30	357.8	42 2 25	80 4 8	BMPH920529IB	3261
Erie	PA US	234A	FA USED	0.00	NN	0	36.15	356.1	42 7 42	80 5 12		3359
Oil City	PA US	242A	FA USED	0.00	NN	0	51.17	145.2	41 25 30	79 42 24		5240
Oil City	PA US	WKQWFM	242A FM LIC	6.00	NN	100	55.84	144.2	41 23 45	79 39 53	BLH920921KD	5137
Mercer	PA US	WLLF	244A FM LIC	1.40	NN	148	57.62	198.6	41 18 43	80 16 39	BLH871130KD	5714
Mercer	PA US	244A	FA USED	0.00	NN	0	57.62	198.6	41 18 43	80 16 39		5596
Edinboro	PA US	WXTA	250B1 FM LIC	10.00	NN	154	18.63	346.0	41 57 59	80 6 40	BLH920326KA	7108
Edinboro	PA US	250B1	FA USED	0.00	NN	0	18.63	346.0	41 57 59	80 6 40		6914
Ashtabula	OH US	WPHR	252A FM CP	2.00	NN	123	52.11	277.0	41 51 39	80 40 46	BPH891207MF	7396
Ashtabula	OH US	252A	FA USED	0.00	NN	0	57.17	281.6	41 54 27	80 43 52		7575
Oil City	PA US	WRJS	253B1 FM LIC	20.00	NN	91	51.46	146.4	41 25 4	79 42 53	BLH850322KS	7760
Oil City	PA US	253B1	FA USED	0.00	NN	0	51.46	146.4	41 25 4	79 42 53		7702
Franklin	PA US	WFRAF	257B1 FM LIC	7.30	NN	183	42.08	164.9	41 26 16	79 55 29	BLH891121KC	8614
Franklin	PA US	257B1	FA USED	0.00	NN	0	44.52	164.8	41 25 0	79 55 0		8611
Erie	PA US	WXKC	260B FM LIC	50.00	NY	150	32.94	15.1	42 5 24	79 57 12	BLH880322KB	9256
Erie	PA US	260B	FA USED	0.00	NN	0	32.94	15.1	42 5 24	79 57 12		9161
Meadville	PA US	WZPR	262B FM LIC	20.00	NN	179	21.58	207.6	41 37 53	80 10 37	BLH851119KD	9706
Meadville	PA US	262B	FA USED	0.00	NN	0	21.58	207.6	41 37 53	80 10 37		9663
North East	PA US	WRKT	265A FM LIC	6.00	NN	80	47.08	20.0	42 12 7	79 51 43	BLH910107KB	10458
North East	PA US	265B1	FA USED	0.00	NN	0	49.72	25.3	42 12 30	79 48 0		10356
North East	PA US	WRKT	265B1 FM CP	4.20	NY	243	50.47	29.9	42 11 51	79 45 10	BPH9202041C	10265
Linesville	PA US	WVCC	269A FM LIC	3.00	NN	67	35.73	247.4	41 40 48	80 27 12	BLH4755	11383
Linesville	PA US	269A	FA USED	0.00	NN	0	35.73	247.4	41 40 48	80 27 12		11367
Erie	PA US	272A	FA USED	0.00	NN	0	26.30	357.8	42 2 25	80 4 8		12006
Erie	PA US	WJET	272A FM LIC	1.70	NY	187	26.30	357.8	42 2 25	80 4 8	BLH920602KB	11817
Erie	PA US	279B	FA USED	0.00	NN	0	33.18	16.4	42 5 25	79 56 37		13651
Erie	PA US	WMXE	279B FM LIC	50.00	NN	152	33.18	16.4	42 5 25	79 56 37	BMLH871209KC	13562
Conneaut	OH US	WGOJ	288A FM CP	6.00	NY	90	38.77	279.6	41 51 42	80 31 1	BPH9003121A	16110
Conneaut	OH US	288A	FA USED	0.00	NN	0	38.77	279.6	41 51 42	80 31 1		16017
Conneaut	OH US	WGOJ	288A FM LIC	3.00	NN	90	38.77	279.6	41 51 42	80 31 1	BLH801023AB	15806
Union City	PA US	292A	FA USED	0.00	NN	0	18.46	70.5	41 51 33	79 50 50		16955

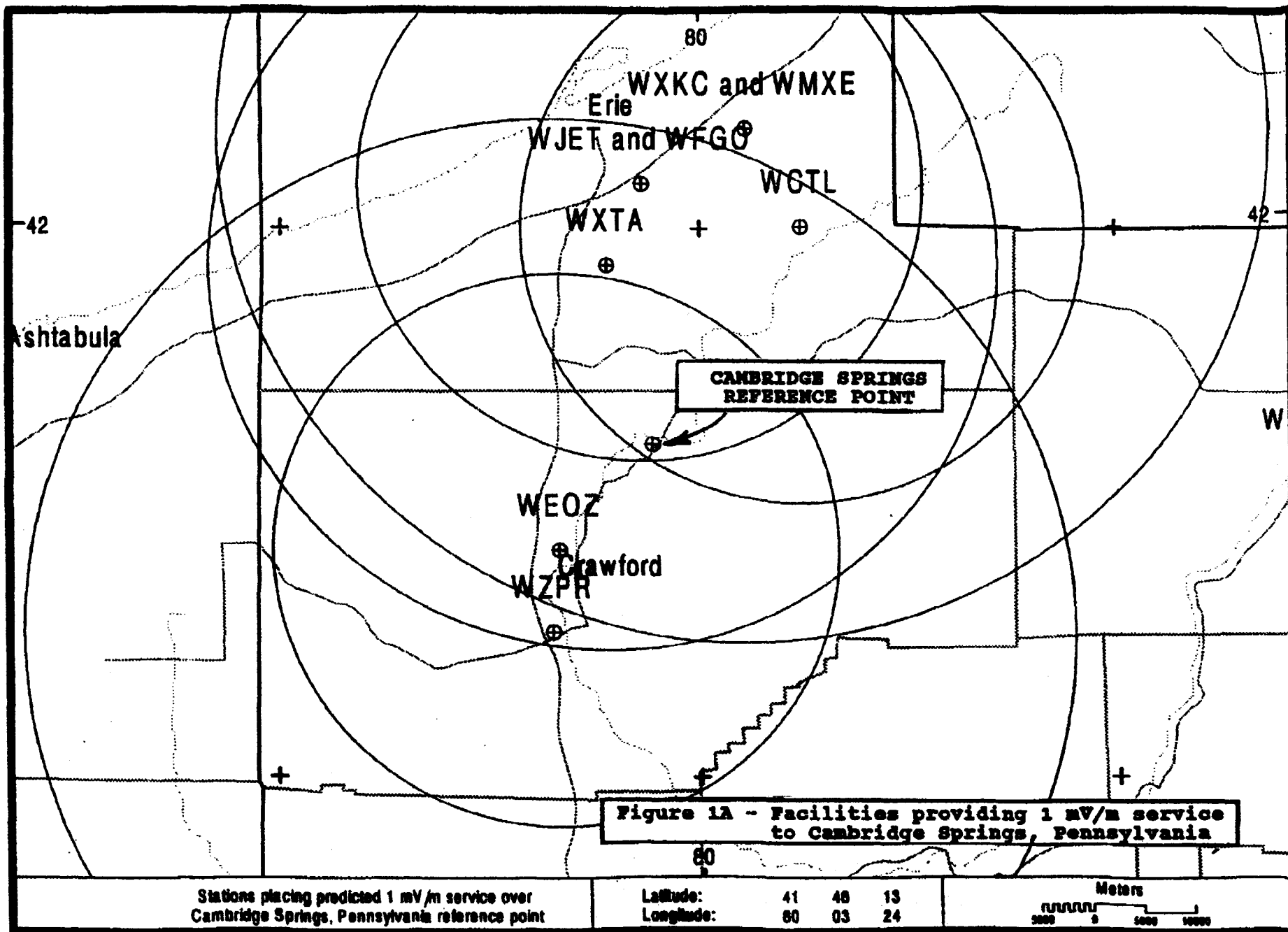
Union City	PA	US	WCTL	292A	FM LIC	3.40	NN	131	26.57	34.4	42	0	4	79	52	33	BLH920323KD	17118
Greenville	PA	US		296A	FA USED	0.00	NN	0	54.91	212.4	41	23	10	80	24	35		18007
Greenville	PA	US	WEXC	296A	FM LIC	3.00	NN	73	54.91	212.4	41	23	10	80	24	35	BLH5859	17906

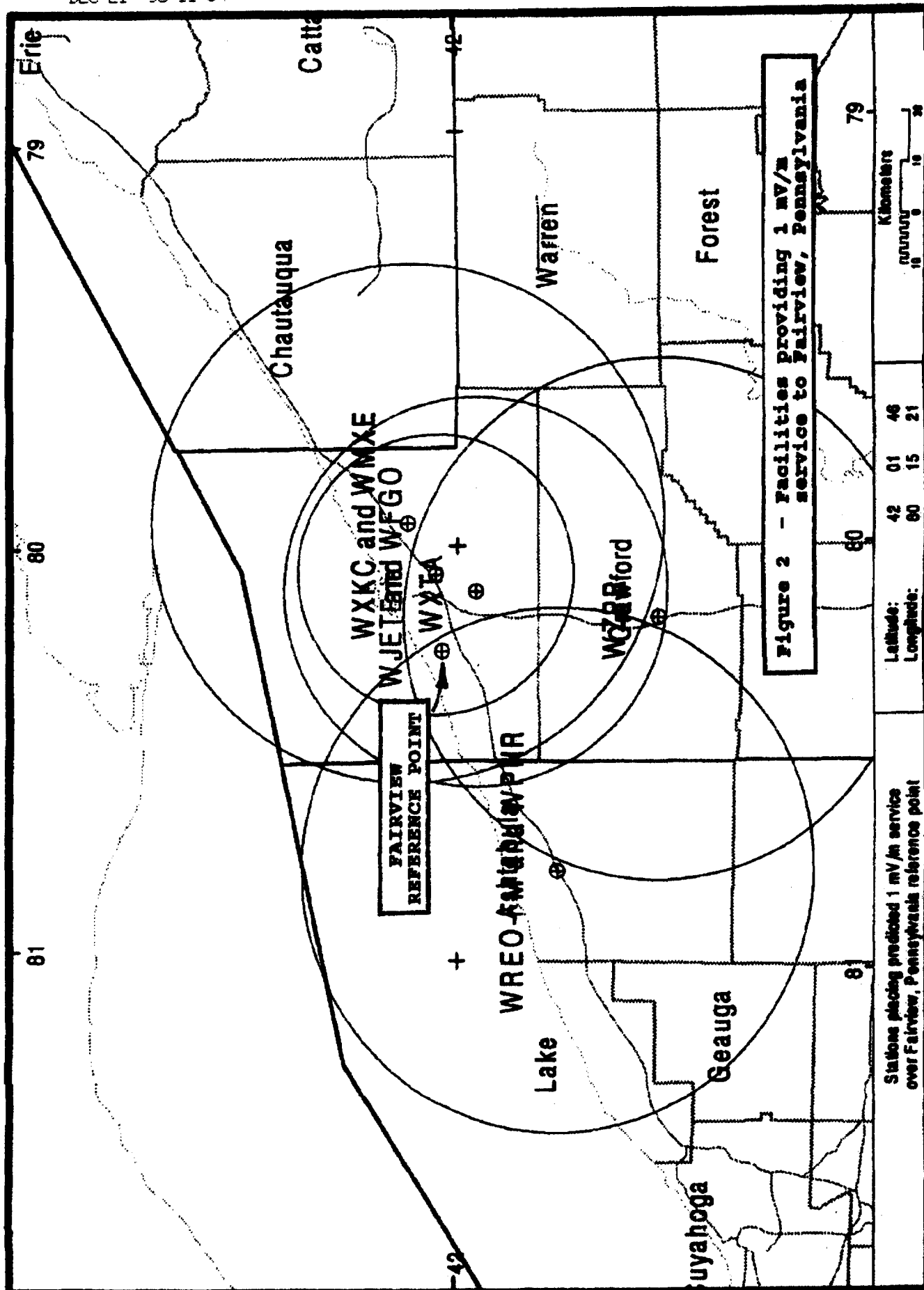
STUDY COMPLETE.  
36 RECORDS PRINTED.

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- Figure 1 - Facilities providing 1 mV/m service to Cambridge Springs, Pennsylvania**
- Figure 1A - Same as above but expanded scale**
- Figure 2 - Facilities providing 1 mV/m service to Fairview, Pennsylvania**
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- Figure 3 - Facilities providing 1 mV/m service to North Kingsville, Ohio**
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- Figure 4 - Services common to Fairview and Cambridge Springs**
- Figure 5 - Facilities which provide service to Cambridge Springs but not Fairview**
- Figure 6 - Facilities which provide service to Fairview but not Cambridge Springs**









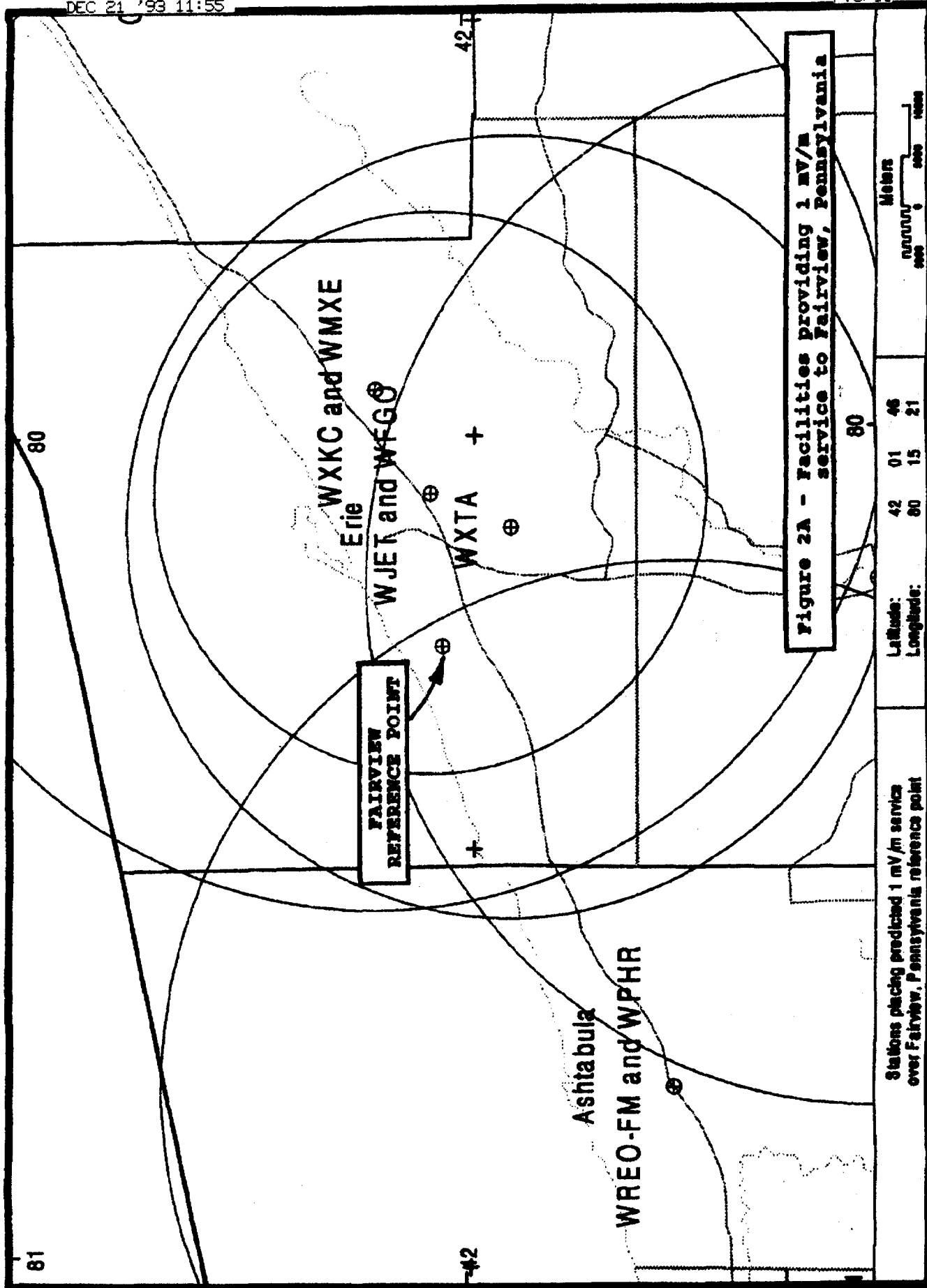


Figure 2A - Facilities providing 1 mV/m service to Fairview, Pennsylvania

Stations placing predicted 1 mV/m service over Fairview, Pennsylvania reference point

Latitude: 42 01 46  
Longitude: 80 15 21

Meters